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Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF GOOGLE  
LLC'S MOTION IN LIMINE NO. 18 TO  
EXCLUDE PLAINTIFFS' EXHIBIT 6**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, hereby declare as follows:

2 1. I am a partner with the law firm Cooley LLP and am counsel for Defendant Google  
3 LLC in the above captioned action. I am duly licensed to practice law in the state of California and  
4 am admitted to practice before this Court. The matters set forth herein are of my own personal  
5 knowledge, and if called as a witness to testify, I could and would testify to these matters. I submit  
6 this declaration in support of Google's Motion *in Limine* No. 18 to Exclude Plaintiffs' Exhibit 6,  
7 filed concurrently herewith.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiffs' Exhibit 6 (PX  
9 6).

10 I declare under penalty of perjury under the laws of the State of California and the United  
11 States of America that the forgoing is true and correct.

12 Executed on August 24, 2025, at San Francisco, California.

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15 /s/ Eduardo E. Santacana  
16 Eduardo E. Santacana  
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